Cc: Gary.Foster@CH2M.com[Gary.Foster@CH2M.com];

George.Hicks@CH2M.com[George.Hicks@CH2M.com]; John Rolfe[jrolfe@demaximis.com]; Robert

Law[rlaw@demaximis.com]; Willard Potter[otto@demaximis.com]

To: Hoppe, Michael[Hoppe.Michael@epa.gov]; Vaughn, Stephanie[Vaughn.Stephanie@epa.gov]

From: Stan Kaczmarek

Sent: Fri 11/8/2013 10:59:48 PM
Subject: Re: TOC Sampling Requirement

Mike,

The CPG is awaiting additional details from EPA on proposed means, methods, and sampling frequency for both sampling and analytical work for TOC in the sand+AquaGate layer. On the Grasse River project, Brennan applied granulated carbon directly into the sediment while testing various methodologies, and did not apply an aggregate product like AquaGate. Given the size of AquaGate (1/4 to 3/8 inch pellets) compared to the sand with which it will be mixed (where 98% consists of particles will be significantly smaller than 1/5 of an inch), getting a representative sample, preparing the sample (grinding and homogenization), and subsequently producing an analytical result that accurately measures the actual percentage of AquaGate within the cap is likely to prove difficult and of limited value. If required to proceed, CPG will implement the testing plan as dictated by EPA, but will continue to base their analysis of the adequacy of AquaGate placement and distribution based on mass balances and visual observations during placement.

See you next week.

Stan Kaczmarek, PE de maximis, inc. 186 Center Street, Suite 290 Clinton, NJ 08809 (O) (908) 735-9315 (C) (973) 978-9621

>>> On 11/6/2013 at 4:58 PM, in message

<2fef26ecb73447a9b9c04ed1852a5e61@BY2PR09MB062.namprd09.prod.outlook.com>, "Hoppe, Michael" <Hoppe.Michael@epa.gov> wrote:

Stan,

To confirm, as per our call today, TOC

sampling is required at yet to be determined intervals as the sand/aquagate material is applied.

I know Stephanie spoke in a little more detail during the call, but we expect to have TOC samples collected. This type of sampling was similarly conducted on other dredge/cap operations, including Grasse River, as she mentioned on the call.

We can discuss the specifics but I need to confirm with Stephanie what we expect as an agency. I have a call with her tomorrow and we will make further recommendations after that call.

Thank you.

Michael Hoppe

Federal On-Scene Coordinator

USEPA Region 2

Response and Prevention Branch

Preparedness Section

Phone: (732) 906-6908 Fax: (732) 321-

4425

Cell: (908) 420-4472



